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Matson[®]
Navigation Company

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93-61

July 19, 1993

Ms. Donna R. Searcy
Secretary
Federal Communications Commission
Washington, D.C. 20554

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These systems improve our inventory management, and improve our operations by reducing errors. Matson feels that better use of resources and increased operational facilities leads directly to improved customer service.

We oppose any FCC regulatory changes that might put our use of this technology in jeopardy and would cause us, at minimum, to have to retrofit existing equipment. Promotion of greater efficiency in shipping has been supported by the Commission which issued the statement that these systems "will likely constitute important components of the future Intelligent Vehicle Highway Systems ["IVHS"]) and tracking of cargo in the trucking, railroad and maritime industries". In fact, much of this is being done now, or is in the planning stages. ISO, ASCII, American Association of Railroads, and the American Truckers Association have all written standards based on existing systems and rules.

There does not seem to be any legitimate reason to grant exclusive use of a broad portion of the existing frequency band to a limited number of companies. This rule change will cause Matson and others who have implemented AVM technology to make significant and expensive changes to their plans and operations. "Grandfathering" existing facilities does not solve the problem since future installations have to work with existing equipment to get the benefits of AVM and may subsequently cause companies to retrofit older sites if the new rules are adopted.

Matson, therefore, opposes PacTel's petition because it requires us to re-engineer planned installations, may cause us to have to retrofit existing sites, and does not seem to be in the public interest in view of the work and standards that have been established by transportation organizations. The continued growth of this new technology should not be discouraged.

Thank you for your consideration of these comments.

Sincerely;



Judd P. Tattershall
Matson Navigation Company, Inc.